

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UBIQUITOUS CONNECTIVITY, LP,

Plaintiff

v.

CITY OF SAN ANTONIO, BY AND
THROUGH ITS AGENT, CITY PUBLIC
SERVICE BOARD OF SAN ANTONIO,

Defendants

§
§
§
§
§
§
§
§
§
§
§

5:18-cv-00718-XR

PLAINTIFF'S JOINT MOTION TO SUBSTITUTE PARTIES

TO THE HONORABLE JUDGE OF SAID COURT,

COMES NOW, Plaintiff Ubiquitous Connectivity, LP ("UCLP") and Charles Shamoon ("Assignee"), a party of interest in the above-named case pursuant to the Federal Rules of Civil Procedure, and files this Joint Motion to Substitute Parties. For the reasons set forth below, the Movants respectfully request the Court enter an order substituting Assignee as the successor-in-interest to and for UCLP:

1. On or about July 19, 2022, UCLP assigned and/or transferred all interests at stake in this matter to Assignee. A true and correct copy of this Assignment of Rights is attached hereto and fully incorporated herein by reference.

2. Under UCLP's Assignment of Rights to Charles Shamoon, UCLP is no longer an interested party in the present matter.

3. Assignee is UCLP's successor-in-interest for the purpose of UCLP's rights to resolution of this matter, and Assignee has voluntarily joined in this motion to ensure the correct parties are designated.

4. Pursuant to Fed. Rule Civ. P. 25, an action such as the above-referenced matter may continue when the interest of one party is transferred.

5. While Godwin Bowman PC serves as corporate counsel for UCLP, it does not undertake representation in the above-referenced matter.

6. **WHEREFORE PREMISES CONSIDERED**, Plaintiff UCLP and Assignee Charles Shamoon respectfully request that the Court grant this Motion and substitute Charles Shamoon for UCLP as Plaintiff.

Respectfully submitted,

GODWIN | BOWMAN PC

/s/ Sidney Scheinberg

Sidney H. Scheinberg

State Bar No. 17736620

SScheinberg@GodwinBowman.com

1201 Elm Street, Suite 1700

Dallas, Texas 75270-2041

Ph: 214.527.3200

Fax: 214.527.3130

**ATTORNEY FOR UBIQUITOUS
CONNECTIVITY**

A handwritten signature in black ink, appearing to read "Charles Shamoon", with a long, sweeping horizontal flourish extending to the right.

Charles Shamoon
PRO SE